



**Public Service  
of New Hampshire**

PSNH Energy Park  
780 North Commercial Street, Manchester, NH 03101

Public Service Company of New Hampshire  
P.O. Box 330  
Manchester, NH 03105-0330  
(603) 669-4000  
[www.psnh.com](http://www.psnh.com)

The Northeast Utilities System

February 2, 2006

Attorney Lynn Fabrizio  
State of New Hampshire  
Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2429

Re: Docket No. DM 05-172 - Investigation Into Utility Poles

Dear Attorney Fabrizio:

The attached PSNH responses to Staff's Data Requests Set No. NSTF-02 are being filed electronically.  
The remaining PSNH responses will be filed when completed.

Response to NSTF-02 Interrogatories dated 01/25/2006

STAFF - 005 , 006 , 007 , 008 , 009 , 011 , 022 , 033 , 034 , 035 , 036

Very truly yours,

A handwritten signature in blue ink, appearing to read "Allen M. Desbiens".

**Allen M. Desbiens**, Senior Analyst  
Rate & Regulatory Services

AMD/kn

THE STATE OF NEW HAMPSHIRE  
before the  
PUBLIC UTILITIES COMMISSION

VERIZON NEW HAMPSHIRE  
AND ELECTRIC UTILITIES

Generic Investigation into Utility Poles  
DM 05-172

AFFIDAVIT OF ROBERT T. HYBSCH

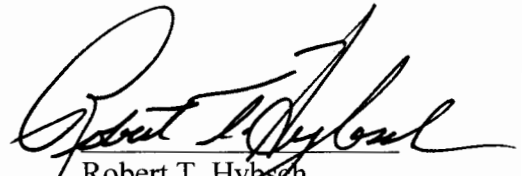
Robert T. Hybsch, being duly sworn, deposes and says as follows:

My name is Robert T. Hybsch. My business address is 780 North Commercial Street Manchester, New Hampshire. I am Director – Customer Operations for Public Service Company of New Hampshire (“PSNH”). My duties include the supervision of the operation, design and new construction of the distribution system, emergency restoration, skills training, community relations and customer service to PSNH’s large commercial and industrial customers.

The responses to data requests submitted to PSNH in the proceeding thus far, Staff Set Nos. 1 and 2, were prepared by me or were prepared at my direction and under my supervision. I affirm, based on my personal knowledge, information and belief, that the responses are true and accurate.

Further the Affiant Sayeth Not.

Feb. 2, 2006  
Date

  
Robert T. Hybsch

Subscribed to and sworn before me this 2<sup>nd</sup> day of February, 2006.

Notary Public Jeanne P. Grace

My Commission Expires \_\_\_\_\_  
JEANNE P. GRACE, Notary Public  
My Commission Expires October 6, 2009

**Public Service Company of New Hampshire  
Docket No. DM 05-172**

**Data Request NSTF-02  
Dated: 01/25/2006  
Q- STAFF-005  
Page 1 of 1**

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

All - If notified by local officials (e.g., police, fire) of an emergency, do you immediately dispatch a crew/technician to the scene? If not, why not? How is the decision made (based on what information) to send appropriate personnel?

**Response:**

Yes, a crew/technician is immediately dispatched. The decision-making and call-in process is more fully described in the PSNH response to NSTF-01, Q-STAFF-001.

**Public Service Company of New Hampshire  
Docket No. DM 05-172**

**Data Request NSTF-02  
Dated: 01/25/2006  
Q- STAFF-006  
Page 1 of 1**

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

All - Please identify any protocol or procedures used by the utility for notification of the emergency management personnel of a licensing municipal, including but not limited to fire or police personnel, or of the state, in the event of an emergency, that pertains to the utility poles in the rights of way.

**Response:**

In the vast majority of situations involving the need for local emergency response personnel, those agencies are the first to know of the emergency and they contact PSNH. Therefore, PSNH does not have any written procedures for notifying local emergency response personnel. In those rare instances when PSNH is the first to know of the emergency, PSNH calls 911 and notifies emergency response personnel via telephone.

**Public Service Company of New Hampshire  
Docket No. DM 05-172**

**Data Request NSTF-02  
Dated: 01/25/2006  
Q- STAFF-007  
Page 1 of 1**

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

All - Please identify in the protocol or procedures described in #2-6, above, the state and local departments and/or individuals to be notified, the timing for such notification during such an emergency and the sequence of departments or individuals notified.

**Response:**

Please see response to NSTF-02, Q-STAFF-006. On the rare occasion that PSNH needs to notify state or municipal authorities of an emergency, PSNH practice is to call 911.

**Public Service Company of New Hampshire  
Docket No. DM 05-172**

**Data Request NSTF-02  
Dated: 01/25/2006  
Q- STAFF-008  
Page 1 of 1**

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

All - State and municipal emergency personnel direct most of their calls, during pole emergencies, to the electric companies. How might the utilities ensure that emergency personnel contact the Verizon ERC, as well as the electric companies, during these emergencies?

**Response:**

Request state and municipal emergency personnel to direct their calls, during pole emergencies, to the electric companies and the telephone companies.

**Public Service Company of New Hampshire  
Docket No. DM 05-172**

**Data Request NSTF-02  
Dated: 01/25/2006  
Q- STAFF-009  
Page 1 of 1**

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

All -- How do the electric companies, normally first on-scene to a pole emergency, feel about continuing to contact the Verizon ERC with the initial damage assessment if state and emergency personnel include Verizon as one of their initial contacts?

**Response:**

Should state and emergency personnel include Verizon as one of their initial contacts, the electric company would not need to notify Verizon. However, we would need assurances from Verizon, and them from us, that we would be responding in a timely fashion to ensure emergency recovery efforts were not impeded by either party. Both joint owners have an obligation to respond to all pole emergencies in a timely fashion.

**Public Service Company of New Hampshire  
Docket No. DM 05-172**

**Data Request NSTF-02  
Dated: 01/25/2006  
Q- STAFF-011  
Page 1 of 1**

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

All - Would adherence to routines suggested in questions #2-8 & #2-9 eventually eliminate the need for local agreements?

**Response:**

No, the routines suggested in NSTF-02, Q-STAFF-008 and Q-STAFF-009 (#2-8 and #2-9) do not provide assurance that either of the joint owners will respond in a timely fashion. If only one of the joint owners is able to respond in a timely fashion there needs to be an agreement in place to allow the responding party the latitude to install poles, regardless of maintenance areas, to ensure the site is made safe and the restoration is completed in a timely manner.

**Public Service Company of New Hampshire  
Docket No. DM 05-172**

**Data Request NSTF-02  
Dated: 01/25/2006  
Q- STAFF-022  
Page 1 of 1**

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

All - Please provide the response times from Verizon garages in Greenland and Somersworth for the last six months? Please provide the number of times when Verizon was not available to respond and identify each event as accurately as possible.

**Response:**

PSNH does not maintain records of the response time for each and every occurrence when crews from the Verizon garages in Greenland and Somersworth are dispatched. PSNH has recorded 3 times in the last 6 months when the response time from the Verizon garages in Greenland and Somersworth exceeded 2 hours:

7/03/05 Pole accident, Locke Road, Rye Waited 3.5 hours for Verizon

9/03/05 Pole accident, 6th Street Dover Waited 3.5 hours for crew from Augusta, Maine to set pole

10/12/05 Pole accident, McDuffee Dr., Rochester Notified Verizon at 1400, they arrived approx 1830.

**Public Service Company of New Hampshire  
Docket No. DM 05-172**

**Data Request NSTF-02  
Dated: 01/25/2006  
Q- STAFF-033  
Page 1 of 1**

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

In 2005 what percentage of digger truck and placer truck down time was attributed to maintenance and or equipment breakdown versus technician shortage due to incidental absence, vacation, training, long-term disability or other personnel factors?

**Response:**

PSNH maintenance records do not track down time for maintenance or repair of our digger trucks. No digger truck was ever down due to a shortage or availability of qualified personnel. PSNH on-call protocol provides coverage for pole emergencies. No emergency response has ever been jeopardized due to the unavailability of a digger truck. If a digger is not available in a particular work center, one will be dispatched to the emergency from the closest work center.

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

All - With respect to Staff question 1-19, please identify the steps that are taken to notify a licensing municipality of changes in the field that affect the terms or conditions of the license granted for that specific pole location, including, but not limited to the location of the pole itself.

**Response:**

By law (RSA 231:161, VI), a pole license, once granted, broadly entitles PSNH to erect or install and maintain its poles in approximately the location designated by the license, and to place upon the poles the wires, cables, guys, cross-arms, fixtures, transformers and other attachments as are required in the reasonable and proper operation of PSNH's business, together with as many wires and cables as the poles are reasonably capable of supporting during their continuance in service. RSA 231:171 specifically provides that any licensed pole may be renewed or replaced as occasion requires in approximately the original location designated, and further provides that any variation in location reasonably necessary in making such renewal or replacement in the usual or customary manner shall not affect the pole licensee's rights. When replacing a pole due to pole accident, storm damage or other similar reason, it is PSNH's commonly followed practice to set the new pole as close as possible to the location of the old pole, in certain circumstances where little or no adjacent space is available, the pole will be set in the same hole as the original pole using the more time consuming and labor intensive "cut and kick" method of pole replacement. Given its pole replacement practices, the broad legal entitlements under its pole licenses both with respect to the initial placement and subsequent renewal or replacement of its poles, and the absence of any general or specific requirement under the pole licensing laws to inform the licensing authority of field changes to the location of a previously licensed pole, PSNH generally does not notify a licensing municipality of replacement and/or renewal of poles. However, when pole relocations due to road widening projects or new pole sets are required, the utility which is responsible for the maintenance area petitions for a new pole license from the licensing municipality.

**Public Service Company of New Hampshire  
Docket No. DM 05-172**

**Data Request NSTF-02  
Dated: 01/25/2006  
Q- STAFF-035  
Page 1 of 1**

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

All - With respect to Staff question 1-37, please state the procedure used within the utility to respond to a notice of removal received from a municipality or the state pursuant to RSA 231 : 177 through 182 inclusive.

**Response:**

PSNH is not aware of ever receiving a notice of removal pursuant to RSA 231:177 through 182. PSNH's design/build process is focused on meeting the customer need date (i.e., municipality and/or state agency). In the unlikely event PSNH was to receive a formal notice of removal pursuant to RSA 231:177 through 182, PSNH would comply with said notice.

**Public Service Company of New Hampshire  
Docket No. DM 05-172**

**Data Request NSTF-02  
Dated: 01/25/2006  
Q- STAFF-036  
Page 1 of 1**

**Witness: Robert T. Hybsch  
Request from: New Hampshire Public Utilities Commission Staff**

**Question:**

All - With respect to Staff question 1-1, please identify whether, at any time covered by data requests in this proceeding, the Commission has ordered specific emergency response procedures to be implemented, and if so how the costs of such implementation are recovered.

**Response:**

PSNH is not aware of any Commission order or Secretarial Letter requiring PSNH to implement a specific emergency response procedure during any time covered by data requests in this proceeding.